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7 RODRICK CARDALE REED

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

United States of America

Plaintiff,

v.

RODRICK CARDALE REED

Defendant

Case No: 5:03-cr-00084-VAP USA

**UNOPPOSED EX PARTE
APPLICATION FOR AN ORDER
SEALING EXHIBIT**

Defendant Reed, by and through his counsel of record, Law Offices of Ian Wallach, hereby applies *ex parte* for an order directing that Defendant's Exhibit A - copy of the Disclosure Letter from the Probation Department dated December 12, 2005, be lodged under seal.

This *ex parte* application is based upon the Declaration of Ian Wallach, the files and records in this case, and such further evidence and argument as the Court may permit.

Dated: May 21, 2021

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3 **DECLARATION OF IAN WALLACH**

4 I, Ian Wallach, am an attorney duly admitted to practice law in the State of
5 California and am the founder of the Law Offices of Ian Wallach, P.C., and attorney for
6 Defendant Rodrick Cardale Reed (“Mr. Reed”) in the above-entitled matter. I make this
7 declaration in support of Mr. Reed’s *Ex Parte* Application for an Order to Seal copy of
8 the Disclosure Letter from the Probation Department dated December 12, 2005.

9 1. For the reasons set forth herein, Mr. Reed seeks to file under seal a true and
10 correct copy of the Disclosure Letter from the Probation Department dated December
11 12, 2005 – a document that was previously filed under seal.

12 2. I have spoken with AUSA Timothy Searight and he does not oppose this
13 application.

14 I declare under penalty of perjury under the laws of the United States that the
15 foregoing is true and correct. Executed this 21st day of May 2021, at Los Angeles, California.

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--s--

17 IAN WALLACH

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